

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CHASIDY PLUNKARD,

Plaintiff

v.

CHARLES H. MARKS, D.O.,

Defendant

Case No. 1:18-CV-1536-JPW

Judge Jennifer P. Wilson

(Electronically Filed)

**JOINT MOTION TO ENTER STIPULATION  
FOR STAY OF EXECUTION AND  
ALL PROCEEDINGS TO ENFORCE JUDGMENT**

Plaintiff Chasidy Plunkard and Defendant Charles Marks, D.O. move this Court to enter the proposed Order and attached Stipulation in lieu of requiring a bond or security under F.R.C.P. 62(b) to stay the judgment entered on June 17, 2021, pending resolution of the Defendant's post-trial motions and any subsequent appeal.

Respectfully submitted,

SAXTON & STUMP, LLC

KLINE & SPECTER, P.C.

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**CERTIFICATE OF SERVICE**

I certify that on this date, I electronically filed the foregoing Joint Motion to Enter Stipulation for Stay of Execution and All Proceedings to Enforce Judgment the following counsel of record, which is available for viewing and downloading on the Court's ECF Notification System.

SAXTON & STUMP, LLC

Date: July 16, 2021

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